

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM, P.A.

1125 Atlantic Avenue - Third Floor

Atlantic City, NJ 08401

(609) 344-3161

File No. 51154.22

Attorney for Defendant, Marina District Development Company, LLC d/b/a Borgata Hotel
Casino & Spa

JOHAN DANIYAN,

: NO. 07-cv-02734 (JHR)(JS)

:

Plaintiff :

vs. :

Civil Action

:

BORGATA HOTEL CASINO,

:

**MOTION IN LIMINE TO BAR
ANY TESTIMONY REGARDING
A WAGE LOSS CLAIM**

:

Defendant. :

:

TO: GREGORY N. FILOSA, ESQUIRE *and* MARY L. BEJARANO, ESQUIRE
Attorneys for Plaintiff

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendant, Marina District
Development Company, LLC d/b/a Borgata Hotel Casino & Spa, will apply to the above named
Court on Monday, January 10, 2011 at 9:00 a.m., or as soon thereafter as counsel may be heard,
for an Order to Bar any testimony regarding a wage loss claim. Reliance will be placed upon the
attached Brief. A proposed form of Order is annexed.

COOPER LEVENSON APRIL
NIEDELMAN & WAGENHEIM, P.A.

BY: 

NANCY A. VALENTINO, ESQUIRE
Attorney for Defendant, Marina District
Development Company, LLC d/b/a Borgata
Hotel Casino & Spa

DATED: JANUARY 3, 2011
CLAC; 475571.1